IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)	
LATRAE DARNELL HAMPTON MIATTA KEBEE HAMPTON 1501 WOODLAND POINTE DR., APT 304 NASHVILLE, TN 37214))))	CHAPTER: 13 CASE NO.: 15-02878 JUDGE: HARRISON
SSN: XXX-XX-6464/3267 Debtor)	

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: MAY 6, 2019. IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: MAY 15, 2019, at 8:30 a.m. in Courtroom 1, Customs House, 701 Broadway, Nashville, TN 37203.

NOTICE OF MOTION TO UTILIZE INSURANCE PROCEEDS AND TO REQUIRE CREDITOR TO RELEASE TITLE OF DESTROYED VEHICLE TO ALLOW DISPOSITION OF SALVAGE

Counsel for Debtor has asked the court for the following relief: to utilize insurance proceeds and to require Creditor to release title of destroyed vehicle to allow disposition of salvage.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. PLEASE NOTE: THE BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE REQUIRES ELECTRONIC FILING. ANY RESPONSE OR OBJECTION YOU WISH TO FILE MUST BE SUBMITTED ELECTRONICALLY. TO FILE ELECTRONICALLY, YOU OR YOUR ATTORNEY MUST GO TO THE COURT WEBSITE AND FOLLOW THE INSTRUCTIONS AT: https://ecf.tnmb.uscourts.gov.

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: US Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state that the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding is.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. *THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.* You may check whether a timely response has been filed by calling the Clerk's office at (615) 736-5584 or viewing the case on the Court's website at <www.tnmb.uscourts.gov>.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: April 15, 2019 Signature: /s/ Jodie Thresher

Name: Jodie Thresher

Address: 1222 16th Avenue South, Suite 12

Nashville, TN 37212-2926

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)	
)	
LATRAE DARNELL HAMPTON)	CHAPTER: 13
MIATTA KEBEE HAMPTON)	CASE NO.: 15-02878
1501 WOODLAND POINTE DR., APT 304)	JUDGE: HARRISON
NASHVILLE, TN 37214)	
SSN: XXX-XX-6464/3267)	
Debtor	,	

MOTION TO UTILIZE INSURANCE PROCEEDS AND TO REQUIRE CREDITOR TO RELEASE TITLE OF DESTROYED VEHICLE TO ALLOW DISPOSITION OF SALVAGE

COMES THE DEBTOR, through counsel, Rothschild and Ausbrooks, PLLC, and would move to utilize insurance proceeds and require Creditor to release title of destroyed vehicle to allow disposition of salvage and in support of this motion would state as follows:

- 1) Debtor moves the Court for an order authorizing them to use insurance proceeds issued as a result of a total loss accident by Progressive Group of Insurance Companies in the amount of \$4,716.00.
- 2) Debtor further moves the Court to require the line-holder on the totaled 2013 Chrysler 200, Insolve Auto Funding, LLC, to release its lien on the title and to remit same to Progressive Group of Insurance Companies to allow disposition of salvage.
- 3) Progressive Group of Insurance Companies shall remit \$3,894.66 to the Chapter 13 Trustee to be earmarked for the claim of Insolve Auto Funding, LLC (ECF Claim #20). Progressive Group of Insurance Companies shall remit the remaining \$821.34, exempt under T.C.A. \$26-2-103, to the Debtors to be utilized in purchasing a replacement vehicle free and clear of liens.

Respectfully submitted,

/s/ Jodie Thresher

Jodie Thresher
ROTHSCHILD & AUSBROOKS, PLLC
Attorney for Debtor(s)
1222 16th Avenue South, Suite 12
Nashville, TN 37212
(615) 242-3996 (telephone)
(615) 242-2003 (facsimile)
notice@rothschildbklaw.com

CERTIFICATE OF SERVICE

I certify that on this 15th day of April, 2019, I served a copy of the foregoing in the following manner:

Email by Electronic Case Noticing to:

Asst. U.S. Trustee

Henry E. Hildebrand, III, Chapter 13 Trustee

By U.S. Postal Service, postage prepaid to:

To the Debtor and affected parties per the attached mailing matrix below.

By U.S. Postal Service, Certified Mail to:

By email to:

Progressive Group of Insurance Companies via email to Caroline_Herd@progressive.com

/s/ Jodie Thresher

Jodie Thresher

63 TOTAL USPS MAILINGS: \$63.00

Action Collection Agency

Attn: Officer Manager or Agent PO Box 210166 Nashville TN 37221

American Car Center

Attn: Officer Manager or Agent 1635 Bell Road Nashville TN 37211

American InfoSource LP as agent for

Case 3:15-bk-02878 Doc 96

PO Box 268941 Oklahoma City, OK 73126-8941

Midland Funding LLC

Attn: Officer Manager or Agent 181 Montour Run Road

Coraopolis PA 15108

Advance Financial

Nashville TN 37203

American Financial

Memphis, TN 38115

Belmont University

6400 Winchester Road

1901 Church St

Attn Officer Manager or Agent

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Capital One

Attn: Officer PO Box 30285

Salt Lake City UT 84130-0285

Cavalry SPV I, LLC

500 Summit Lake Drive, Ste 400 Valhalla, NY 10595

Credit One Bank

Attn: Officer PO Box 98872 Las Vegas NV 89193

Credit Vision Inc

Attn: Officer Manager or Agent 2211 E Continental Blvd #170 Southlake TX 76092

DIAGNOSTIC IMAGING, INC

C/O FOX COLLECTION CENTER PO BOX 528 GOODLETSVILLE, TN 37070

Discover Financial Services LLC

Attn: Officer PO Box 15316 Wilmington DE 19850

Eagle Accounts Group Inc

Attn: Officer Manager or Agent PO Box 17400 Indianapolis IN 46217-0400

FedLoan Servicing Credit

Attn: Officer Manager or Agent PO Box 60610 Harrisburg PA 17106-0610

First Premier Bank

Attn: Officer 3820 N Louise Ave Sioux Falls SD 57107-0145

Harpeth Financial Services, LLC

c/o Glen Watson, Attorney P.O. Box 121950 Nashville, TN 37212

Internal Revenue Service

Centralized Insolvency Operations PO Box 7346 Philadelphia,PA. 19101-7346

Cash 1

Attn: Officer Manager or Agent PO Box 110787 Nashville TN 37222-0787

Credit Acceptance Corp

Attn: Officer Manager or Agent 25505 W 12 Mile Rd #3000 Southfield MI 48034-8339

Credit Solutions LLC

Attn: Officer Manager or Agent 2277 Thunderstick Dr #400 Lexington KY 40505-9002

DAVIDSON COUNTY CRIMINAL COURT

C/O ROBINSON REAGAN & YOUNG 446 JAMES ROBERTSON PKWT SUITE 200 NASHVILLE, TN 37219

Discover Bank

Discover Products Inc PO Box 3025 New Albany, OH 43054-3025

Drive Time

Attn: Officer Manager or Agent PO Box 29018 Phoenix AZ 85038

Equiant Financial Svcs

Attn: Officer Manager or Agent 5401 N Pima Rd #150 Scottsdale AZ 85250

First National Credit Card

Attn: Officer 500 E 60th St N Sioux Falls SD 57104-0478

Fox Collection Center

Attn: Officer Manager or Agent PO Box 528 Goodlettsville TN 37070-0528

InSolve Auto Funding, LLC, c/o Capital Recovery

Gr

Dept 3403 PO Box 123403 Dallas, TX 75312-3403

Jerry E Martin Esq/US Attorney

Middle District of TN 801 Broadway #400 Nashville TN 37203

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LEGACY VISA

C/O MILLENNIUM FINANCIAL GROUP LLC

3000 UNITED FOUNDERS BLVD SUITE 219

OKLAHOMA CITY OK 73112

MAPFRE Insurance

Attn: Officer Manager or Agent 11 Gore Road Webster MA 01570

Merrick Bank

Attn: Officer PO Box 1500 Draper UT 84020

Midland Credit Management, Inc.

as agent for MIDLAND FUNDING LLC PO Box 2011 Warren, MI 48090

Navient Solutions Inc.

220 Lasley Ave Wilkes-Barre, PA 18706

Pinnacle Credit Sycs

Attn: Officer Manager or Agent PO Box 640 Hopkins MN 55343-0640

PREMIER ORTHO-DR J WIECK

C/O FOX COLLECTION CENTER PO BOX 528 GOODLETSVILLE, TN 37070

Purchasing Power

Attn: Officer Manager or Agent 1349 W Peachtree St NW #1100 Atlanta GA 30309

Revenue Recovery Corp

Attn: Officer Manager or Agent PO Box 50250 Knoxville TN 37950-0250

Sallie Mae/Navient/Bankruptcy Dept

Attn: Officer Manager or Agent PO Box 9430 Wilkes Barre PA 18773-9735

Sprint Corp Bankruptcy Dept

Attn: Officer Manager or Agent PO Box 7949

Overland Park KS 66207-0949

Stellar Recovery Inc

LHR Inc

Attn: Officer Manager or Agent 56 Main Street Hamburg NY 14075-4905

MARS Inc

Attn: Officer Manager or Agent 5810 E Skelly Drive #200 Tulsa OK 74135

MERRICK BANK

Resurgent Capital Services PO Box 10368 Greenville, SC 29603-0368

Midland Funding LLC

Attn: Officer Manager or Agent 8875 Aero Drive #200 San Diego CA 92123

Navient Solutions, Inc.

220 Lasley Ave Wilkes-Barre, PA 18706

Premier Bank, LLC

c o Jefferson Capital Systems LLC PO BOX 7999 SAINT CLOUD MN 56302-9617

PREMIER ORTHO-HARDING PT

C/O FOX COLLECTION CENTER PO BOX 528 GOODLETSVILLE, TN 37070

RADIOLOGY ALLIANCE

C/O FOX COLLECTION CENTER PO BOX 528 GOODLETSVILLE, TN 37070

Robinson Reagan & Young PLLC

Attn: Officer Manager or Agent 105 Broadway #300 Nashville TN 37201

Santander Consumer Bankruptcy Dept

Attn: Officer Manager or Agent PO Box 560284 Dallas TX 75356-0284

Sprint Corp.

Attn Bankruptcy Dept PO Box 7949 Overland Park KS 66207-0949

TD BANK USA, N.A.

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Attn: Officer Manager or Agent

1327 Hwy 2 W #100 Kalispell MT 59901

TD Bank USA/Target Credit

Attn: Officer PO Box 673 Minneapolis MN 55440

Telerhythmics LLC

Attn: Officer Manager or Agent 60 Market Center Dr Collierville TN 38017

TN Student Assistance Corp

Attn: Officer Manager or Agent PO Box 173695 Denver CO 80217-3695

United States Attorney General

Department of Justice 950 Pennsylvania Ave NW Washington DC 20530-0001

US Dept of Education/Nelnet

Attn: Officer Manager or Agent 3015 Parker Road #400 Aurora CO 80014 C O WEINSTEIN & RILEY, PS 2001 WESTERN AVENUE, STE 400 SEATTLE, WA 98121

Tek Collect

Attn: Officer Manager or Agent PO Box 1269 Columbus OH 43216

TN Atty Generals Office BK Unit

RE: TN Student Assistance Corp PO Box 20207 Nashville TN 37202

U.S. Department of Education

C/O Nelnet 3015 South Parker Road, Suite 400 Aurora, CO 80014

Universal Charge Account

Attn: Officer Manager or Agent 665 Rodi Rd #300 Pittsburgh PA 15235

Western Kentucky Univ/Perkins Loan Ofc

Attn: Officer Manager or Agent 1906 College Hgts #11023 Bowling Green KY 42101